

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF ARKANSAS
FAYETTEVILLE DIVISION**

Chamberlain Family Limited Partnership,)	
)	
Plaintiff,)	
v.)	
)	Case No. 5:17-cv-05078-TLB
Steven Sanders, Sr., Steven Sanders, Jr.,)	
Danielle Sanders, David Ethredge, Ioulia)	Honorable Timothy L. Brooks
Nikiforova, and Kristine Kolbus,)	
)	
Defendants,)	
)	
--and--)	
)	
NATCO Communications, Inc.)	
)	
Nominal Defendant.)	

AGREED MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT

Plaintiff and Defendants, by their counsel and pursuant to Rule 23.1 of the Federal Rules of Civil Procedure, hereby jointly moves the Court for entry of an Order: (i) granting preliminary approval of a shareholder derivative action settlement; (ii) scheduling a settlement hearing regarding this matter; and (iii) providing notice to all shareholders of Nominal Defendant NATCO Communications, Inc. in the manner described in the Parties' proposed orders attached to the Memorandum of Law in Support of this Agreed Motion (the "Memo of Law").

In support of this Motion, the Parties concurrently submitted the aforementioned Memo of Law attaching: (i) a proposed order preliminary approving the proposed settlement agreement and setting a settlement hearing (Memo of Law, Exhibit A); (ii) a proposed shareholder notice notifying NATCO's shareholders of the proposed settlement agreement and the date, time, and location of the settlement hearing and permitting the shareholders to object to the proposed

settlement agreement (Memo of Law, Exhibit B); and (iii) a proposed order approving the settlement and dismissing the action without prejudice following the settlement hearing (Memo of Law, Exhibit C). In addition, the Parties have concurrently filed an Agreed Motion to File Under Seal the Parties' Proposed Settlement Agreement, due to the confidential nature of the proposed settlement agreement, for the Court's review and inspection in support of this Motion.

WHEREFORE, for the reasons set forth in the Parties' Memo of Law, all Parties jointly request that (i) the Proposed Order (Memo of Law, Exhibit A) preliminary approving the settlement, setting a Settlement Hearing, and ordering distribution of the Proposed Shareholder Notice (Memo of Law, Exhibit B) be entered; (ii) the Proposed Order Approving the Settlement and dismissing this action without prejudice (Memo of Law, Exhibit C) be entered at the conclusion of the Settlement Hearing; and (iv) the Court enter any other such relief it deems just and proper.

Dated: July 17, 2017

/s/ Stephen R. Lancaster

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 17, 2017, the foregoing document was served on all counsel of record via the Court's ECF system.

/s/ Robert L. Jones